

**UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

GEORGIA M. BROWN,

Plaintiff,

vs.

VHS OF MICHIGAN, INC.,  
d/b/a/ DETROIT MEDICAL CENTER,  
A Delaware For Profit Corporation,

Defendant.

Case No. 11-cv-15508

Hon. Robert H. Cleland  
Magistrate Judge Mona K. Majzoub

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**STIPULATED PROTECTIVE ORDER AS TO DEFENDANT'S PRODUCTION OF  
CONFIDENTIAL DOCUMENTS**

Plaintiff and Defendant submit this Stipulated Protective Order as to Defendant's Production of Confidential Documents ("Order") to preserve the confidentiality of certain documents that may be produced during the course of or referenced in or incorporated into the pleadings during the pendency of the above-captioned action (the "Action"). Pursuant to the stipulation of counsel,

IT IS HEREBY ORDERED as follows:

1. All documents produced in the course of discovery in this Action, and the information contained therein, shall be used by the recipient solely for the purpose of this litigation and for no other purpose whatsoever. Any such documents and information shall not be disclosed to third parties, except for the conduct of this Action.

2. If either party in good faith believes that certain documents previously produced or to be produced contain confidential or proprietary information meriting heightened protection, the producing party may designate such documents as "Confidential" ("Confidential Documents"). Any such Confidential Documents shall be held by the recipient in strict confidence and shall not be disclosed to third parties, except clients, witnesses and experts (each a "Permitted Third Party") as needed for the conduct of this Action. No Permitted Third Party shall be given a copy of any Confidential Document unless the Permitted Third Party has a need for the copy in connection with this Action, and has executed an acknowledgement in the form of Exhibit A.

3. In the event any pleadings appending, incorporating or containing Confidential Documents are filed with the Court in this Action, they shall be filed in sealed envelopes bearing the title of the Action, and shall be marked "CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER," to be opened only as the Court directs.

4. Nothing in this Order shall limit a party's right to use or disclose any documents produced by that party in this Action, except that Confidential Documents shall be filed under seal as stated in paragraph 3.

5. Within 90 days after receiving notice of the entry of an order, judgment or decree terminating this Action and upon conclusion of any appeals, all persons having received records designated as "Confidential – Subject to Protective Order" shall either return all such records to

the counsel for the party that produced the records, or destroy all such records and, upon demand, certify that fact in writing.

Dated: 5/11/2012

s/Robert H. Cleland  
UNITED STATES DISTRICT COURT JUDGE

**APPROVED AS TO FORM:**

/s/ Christopher W. Quinn  
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**EXHIBIT A**

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**AGREEMENT CONCERNING CONFIDENTIAL RECORDS**

I, \_\_\_\_\_, to obtain access to Confidential records

in connection with the above-captioned matter, certify as follows:

1. I have read the Stipulated Protective Order as to Defendant's Production of Confidential Documents ("Protective Order") in the above-captioned action and understand its terms.

2. I agree to be bound by the terms of the Protective Order entered in the above-captioned action. I agree to use the Confidential records provided to me, and the information contained therein, only for the purposes of this litigation. I will hold such Confidential documents and all information therein in strict confidence and not disclose or divulge same to any third parties. Upon the conclusion of the lawsuit, I will promptly destroy all such Confidential materials.
3. I understand that my failure to abide by the terms of the Protective Order entered in the above-captioned action may subject me to sanctions for contempt of court.
4. I submit to the jurisdiction of the United States District Court, Eastern District of Michigan, for purposes of enforcing the terms of the Protective Order entered in the above-captioned action.

Date: \_\_\_\_\_

\_\_\_\_\_  
(signature)

Print Name: \_\_\_\_\_

Address: \_\_\_\_\_

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